

10 February 1994

Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

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Sirs:

Please find attached my comments to the F.C.C. regarding the matter of PR DOCKET 93-305. You will find an original copy plus 9 additional copies - 1 for each Commissioner.

FCC MAIL ROOM

Sincerely,

*Ronald W. Ostman*

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FEDERAL COMMUNICATIONS COMMISSION  
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In the matter of PR DOCKET 93-305

Amendment to the Amateur Service Rules to Implement a Vanity Call Sign System  
Sirs:

For your consideration: Vanity 1: something that is vain, empty or useless 2: the quality or fact of being useless or futile. FUTILITY 3: undue pride in oneself or one's appearance. CONCEIT.

The above definitions, taken directly from The Merriam-Webster Dictionary, go a long way, I believe, towards summarizing the feelings that the majority, albeit silent, of amateur radio operators have regarding the ridiculous, self-serving proposal for vanity callsign issuance.

I hardly think that there has been a great public outcry from the amateur community for this. The ARRL and the F.C.C. make it sound as if this proposal came about as a result of input from thousands of amateurs. This is simply not the case. In the January 1994 issue of CQ magazine, F.C.C. Correspondent Frederick O. Maia, W5YI, states: "Believe it or not, this action was largely the result of a single amateur who told his congressman that amateurs were indeed willing to pay for a special callsign. It came at an opportune time when the Clinton administration was looking for ways to generate revenue". Anotherwords, this appears to be a political move that does, I admit, have the potential for making the F.C.C. and Congress look good in terms of increased revenue.

There is a plethora of dangerous possibilities once this Pandora's box is opened. W5YI, also in the January CQ magazine Washington Readout column, goes on to state: "The F.C.C. has said that it could be possible...to obtain any unassigned callsign, 'will' callsigns to heirs or friends, or retire a callsign permanently". He continues: "...anyone - amateur or non-amateur could reserve any available callsign". It sounds to me like there may be some interesting financial opportunities for enterprising individuals. Some amateurs will, no doubt, violate the "non-pecuniary interest" rules by playing musical chairs with and speculating in the call sign "market". Private enterprises will offer for sale unique call signs out of entire blocks they will have reserved, bought and paid for in advance, leaving individual amateurs at a disadvantage. Anotherwords, what this proposal boils down to is money, politics, greed, conceit and yes- vanity.

Does amateur radio need this to grow and to thrive? No. Indeed, the possible ill-effects of this proposal, in my mind, far outweigh the ego-boost or "warm fuzzy feeling" that a few amateurs will receive by getting their favorite "CB handle" or "contest-friendly" call sign.

Let's put the brakes on this ridiculous proposal and stop to think about what the real issues are that amateurs, the ARRL and the F.C.C. should be concerned about. Some of these issues are: amateur growth (numbers vs. quality), amateur testing standards (meaningless now with the proliferation of question pool cheat sheets), technical proficiency and innovation (directly related to the watered-down testing standards), spectrum justification, usage and management, fostering the growth of the domestic electronics industry once again, true public service (as opposed to self-serving publicity generating activities), ...etc. The list of important issues facing amateur radio today is quite long. In general, all of the above-listed issues revolve around restoring the high standards that were once an inherent part of the amateur service. Vanity call signs are simply not important to the survival of amateur radio in this time of rapidly evolving communications technologies. The waning attention given to the above-mentioned issues does, however, pose a direct threat to the viability of the amateur radio service. Indeed, amateur radio seems to be in direct competition with a few of the emerging personal communications technologies, instead of assuming a role of innovation and leadership. At this critical time, the amateur radio service needs to project a professional image to the public, to ourselves and to the government that ultimately regulates our activities. Vanity call signs do not lend themselves very well to this effort.

Amateur radio is not just a hobby. It is (can be) a valuable national asset. Those of the general public who have had the opportunity to be exposed to the many and varied facets of the hobby have usually been impressed by the technical expertise and professional conduct demonstrated. Vanity call signs may seem like "the thing to do" now; but how will a proliferation of this trendy action ultimately affect the hobby's image? Negatively, I'm afraid. Just like a garish tattoo whose initial appeal may have been great, we will eventually ask ourselves, "Why did we do it"? Vanity call signs, like CB-handles, hardly project a professional image, do they? Let's not "sugar-coat" our hobby any further - please. This is what vanity call signs would do. Instead, let's roll up our sleeves and get to work on the multitude of other important issues facing amateur radio at this time.

The only defensible merit of the vanity call sign proposal is "revenue enhancement". Please pursue other options. Reasonable application fees and renewal fees should not be out of the question for amateur licensees. The arguments against these fees are baseless. There is not a single amateur operator who can say that the hobby is not worth \$5 or \$10 a year. Young kids spend more than that weekly on music and other things. Again - please consider this option for your "revenue enhancement".

It is not the dictate of the F.C.C. to be popular with all those it serves. It is, however, the job of the F.C.C. to regulate our activities, facilitate an environment that fosters technical experimentation and innovation and to ultimately determine applicable compliance issues. The vast majority of amateur operators expect this of the F.C.C. and do realize ~~the~~ the benefits that result, e.g. rules enforcement and appropriate punishment means for the few blatant offenders among us who would quickly turn the hobby into a CB-like melee if left un-checked. Funding these licensing and rules enforcement activities through reasonable application and renewal fees would be acceptable to most amateurs, I believe. We have been getting a free ride long enough. These fees would be a small price to pay for the benefits and enjoyment we amateurs derive from the hobby.

I cannot believe that the vanity call sign proposal is even being considered by the ARRL or the F.C.C. If the F.C.C. is at all serious about funding its amateur related operations, it would (and should) implement an equitable fee structure for all licensees. People pay to license their cars, motorcycles, boats, etc. and pay numerous other annual fees with hardly a thought. Why is it that every time amateur license fees are brought up, the ARRL refuses to even hint at endorsing such an idea? This is a rhetorical question, of course - the answer is "money". The ARRL, understandably, does not want to risk losing membership by supporting any sort of additional fees for amateurs. I honestly think, however, that the ARRL would be surprised by just how many amateurs are willing to "pay their fair share". \$5 or \$10 per year paid by all licensed amateurs would go a long way towards fully-funding the F.C.C. amateur-related operations, wouldn't it?

This hobby of ours is not a right - it is an earned privilege. If our far-reaching communications capabilities (and the use of valuable RF spectrum) were to be seen as a "right" for which no payment is due; then I would say that the telephone companies and other for-profit communications providers would have reason to worry. This is not the case, of course. We do not think twice about paying our phone bill every month <sup>even</sup> though the majority of individual users derive no monetary gain from its use. <sup>^</sup> The same should apply to our use of valuable RF spectrum for personal communications purposes. This argument can lead in many directions but the simple truth of the matter is that amateur radio operators should pay some small amount at least for the opportunities afforded us.

It is quite obvious, unfortunately, that more than a few on the ARRL (and F.C.C.?) staff have taken advantage of previous call sign selection opportunities themselves. I can only hope that this does not create a bias in defense of this current proposal. The ARRL should take a stand based on what this proposal could do to amateur radio, as a whole - not what this proposal could do for a few individual amateur's egos.

If the ARRL and the F.C.C. insist upon pursuing amateur call sign issuance restructuring, then please consider all of the possible ramifications before hastily implementing any such plan.

Sincerely,  
*Ronald W. Ostman*  
Ronald W. Ostman, WBØNYQ